

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
Fieldwood Energy III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Post-Effective Date Debtors.	§	Chapter 11
	§	
	§	Jointly Administered

**STIPULATION AND AGREED ORDER WITHDRAWING (I) SUPERSEDED
ADMINISTRATIVE EXPENSE PROOF OF CLAIM AND (II) OBJECTION TO
ADMINISTRATIVE EXPENSE CLAIM**

[Relates to Doc. No. 2556]

The United States of America on behalf of the United States Department of Interior (“Interior”), together with the Plan Administrator¹ for the above-captioned reorganized debtors (collectively, the “Debtors”), hereby stipulate and agree as follows:

1. On August 3, 2020 and August 4, 2020, the Debtors each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”).
2. On June 25, 2021, the Bankruptcy Court entered the *Findings of Facts, Conclusions of Law, and Order Confirming Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* (the “Confirmation Order”) [Docket No. 1751] confirming, as modified therein, the *Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* (the “Plan”).
3. On August 27, 2021, the effective date of the Plan occurred (the “Effective Date”)

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors*.

and the Debtors filed the *Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors and (II) Occurrence of Effective Date* [Docket No. 2016].

4. On March 25, 2022, Interior timely filed its Administrative Expense Proof of Claim against Fieldwood Energy LLC arising from the Debtor's unpaid obligations to the Office of Natural Resources Revenue (the "ONRR Obligations") in the amount of \$234,960.21. (Claim No. 1092).

5. On May 12, 2022, Interior filed an Amended Administrative Expense Proof of Claim against Fieldwood Energy LLC reflecting unpaid ONRR Obligations in the amount of \$219,705.34. (Claim No. 1134).

6. Claim No. 1134 was intended to supersede Claim No. 1092.

7. On July 19, 2022, the Plan Administrator filed its *Fifteenth Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims* [Docket No. 2556] (the "Objection"), which set forth an objection to Claim No. 1092 on the grounds that it was superseded by Claim No. 1134.

8. To the resolve the Objection, Interior and the Plan Administrator stipulate and agree as follows:

- a. The Objection to Claim No. 1092 is withdrawn;
- b. Claim No. 1092 is withdrawn; and
- c. Nothing contained in this Stipulation modifies or alters the rights and interests of the United States set forth in the Plan and Confirmation Order.
- d. Nothing contained in this Stipulation modifies or alters the rights of the Plan

Administrator, including with respect to Claim No. 1134.

9. This Court retains exclusive jurisdiction and power to resolve any dispute arising from or related to this Order.

IT IS SO ORDERED.

Dated:

Honorable Marvin Isgur
United States Bankruptcy Judge

[signature page follows]

AGREED AS TO FORM AND CONTENT:

Dated: August 17, 2022

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